

Concerned Citizens for Environmental Justice

April 12, 2014 ~ 5:00 p.m.

The Living Word Church of God In Christ, 2109 Main Street, Crossett, AR 71635

Meeting Agenda

Opening Prayer

Pastor David Bouie Sr.

Overview & Introductions

Pastor David Bouie Sr.

U.S. EPA Region 6

- Update on EPA Community Activities

Mr. Sam Coleman,

Deputy Regional Administrator

City of Crossett

- Community Drinking Water Systems

Mr. Anthony Adcock,

Plant Superintendent

Arkansas Department of Health

- Public Water System Supervision Program
- Cancer Registry Program
- Environmental Health Assessment Program

Mr. Jeff Stone,

Director, Engineering Section

Arkansas Department of Environmental Quality

- Air Monitoring – City of Crossett & Georgia Pacific LLC
- Wastewater Monitoring – Georgia Pacific LLC
- Hazardous & Solid Waste Monitoring – Georgia Pacific LLC
- Citizen Complaint Program

Mr. Ryan Benefield,

Deputy Director

Louisiana Environmental Action Network (LEAN)

- Health Impacts – Results of Health Surveys
- Air Quality Issues – Hydrogen Sulfide

Ms. Wilma Subra,

Chemist/Technical Adviser

Question & Answer Period

Closing Remarks

Pastor David Bouie Sr.

CONFERENCE CALL AGENDA

Arkansas (City of Crossett, ADEQ, ADH) Phone Conference with EPA Region 6
April 8, 2014 – 2:15 p.m. CST

Location: RA's Large Conference Room

Organizer: Sam Coleman, DRA EPA Region 6

Purpose: To discuss agenda, logistics, and scope of discussions for April 12, 2014

Call-In Number: 1-866-299-3188

Conference Code: 214-665-3138

Roll Call

Status Update

Discussion

- **Concerned Citizens for Environmental Justice Meeting**
 - Date: Saturday, April 12, 2014
 - Time: 5:00 p.m.
 - Location: The Living Word Church of God in Christ, 2109 Main Street, Crossett, AR 71635
 - Attendees: Pastor David Bouie Sr. (meeting host – Concerned Citizens for Environmental Justice), community members, and staff from EPA R6, ADEQ, ADH, and the City of Crossett.
 - Pending Items: Names of Representatives for City of Crossett, ADEQ, ADH

Questions

Follow-ups and Action Items

Adjourn

TALKING POINTS FOR TRAVEL TO CROSSETT, ARKANSAS

DRA Attendance at Concerned Citizens for Environmental Justice (CCEJ) Meeting

Saturday, April 12, 2014

1. Community Air Concerns.

Hydrogen Sulfide

- Calendar year 2012 is the first year that certain facilities were required to report hydrogen sulfide releases to EPA.
- The Toxic Release inventory is a publicly available database that contains information on toxic chemical releases and waste management activities reported annually by certain industries and federal facilities.
- Georgia Pacific (GP) reported, to the TRI, over 500,000 pounds of hydrogen sulfide releases to the air for 2012.
- The reports are required to be "an estimate of total releases..." The 2012 GP report was based on modeling studies, not monitoring results.
- EPA conducted inspections in March 2014 to determine if GP is in compliance with TRI requirements. We are currently reviewing the inspection data.

Air Planning

- Crossett, AR, is in compliance with all National Ambient Air Quality Standards.
- The Arkansas Department of Environmental Quality's (ADEQ) Clean Air Act 111(d) Plan requires the GP facility to conduct compliance testing and continuous monitoring for Total Reduced Sulfur (TRS) emissions. TRS is the sum of the sulfur compounds hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide.
- Boilers 6A and 9A are subject to the Clean Air Act's Best Available Retrofit Technology requirements which are intended to improve visibility, particularly in national parks and recreation areas. The Arkansas Regional Haze State Implementation Plan (RH SIP) was submitted to EPA in September 2008. EPA Region 6 worked with ADEQ and GP to ensure the 6A and 9A boilers at the facility were in compliance with BART requirements.

Georgia-Pacific LLC – Crossett Paper Operations

Title V Permit Valid Between August 4, 2011 and August 3, 2016

- Emission sources located at Crossett Facility are subject to applicable federal new source performance standards (NSPS) and maximum achievable control technology (MACT) requirements for air toxic emissions. The applicable rules that apply to the facility are:
 - 40 CFR 60, Subpart BB – Standards of Performance for Kraft Pulp Mills
 - 40 CFR 63, Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
 - 40 CFR 63, Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills
- ADEQ Permit Establishes Limits Corresponding to NSPS BB Requirements for Recovery Furnaces, Smelt Dissolving Tanks for Total Reduced Sulfur (TRS) and H₂S at Lime Kiln

- ADEQ Permit Establishes MACT Limits & Control Requirements Corresponding to NESHAP S Requirements for Toxic Air Pollutants at Smelt Dissolving Tanks, Incinerator and Scrubber, and Pulping System.
- ADEQ Permit Establishes MACT Limits & Control Requirements Corresponding to NESHAP MM Requirements for Recovery Furnace and Lime Kiln.
- There are other applicable NSPS and MACT requirements that may apply to other equipment at the facility such emergency generator engines, etc.
- The ADEQ Title V permit appears to have applied the appropriate NSPS and MACT requirements to the source.

TRS Emission Limits Contained in Permit:

EPN	Emission Limit	Regulation
SN-59, Batch Digesters	0.9 lb/hr; 3.9 tpy	[§19.304 and §19.501 et seq. of Regulation #19, 40 CFR Part 52 Subpart E]
SN-33, Line 1 Washer	2.1 lb/hr; 7.9 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-34, Line 2 Washer	2.1 lb/hr; 7.9 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-61, Line 2 Decker	2.1 lb/hr; 7.7 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-96, Salt Cake Mix Tank	0.1 lb/hr; 0.2 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-26, 8R Recovery Furnace	11.2 lb/hr; 48.8 tpy 5 ppm @ 8% O ₂ , 12-hr average	[§19.304, §19.501 et seq., and §19.801 of Regulation #19; 40 CFR Part 52 Subpart E; and 40 CFR §60.283]
SN-27A, Smelt Dissolving Tank (East)	2.4 lb/hr, 9.1 tpy 0.016 g TRS per kg of black liquor solids 0.033 lb/TBLS) as H ₂ S	[§19.304, §19.501 et seq., and §19.801 of Regulation #19; 40 CFR Part 52 Subpart E, 40 CFR §60.283]
SN-27B, Smelt Dissolving Tank (West)	2.4 lb/hr, 9.1 tpy 0.016 g TRS per kg of black liquor solids 0.033 lb/TBLS) as H ₂ S	[§19.304, §19.501 et seq., and §19.801 of Regulation #19; 40 CFR Part 52 Subpart E, 40 CFR §60.283]
SN-25, Lime Kiln	2.2 lb/hr, 9.6 tpy 8 ppm measured as H ₂ S on a dry basis, on a 12-hour average, corrected to 10% O ₂	[§19.304, §19.501 et seq., §19.801 of Regulation #19; CFR Part 52 Subpart E; and 40 CFR §60.283]
SN-55F, Lime Slaker Vent #1	0.8 lb/hr, 2.8 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN-56F, Lime Slaker Vent #2	0.8 lb/hr, 2.8 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-94, Green Liquor Clarifier A	0.1 lb/hr, 0.1 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-98, A Side Causticizers	0.4 lb/hr, 1.2 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-99, B Side Causticizers	0.4 lb/hr, 1.2 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-100, White Liquor Storage Tanks	0.3 lb/hr, 1.0 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-103, Green Liquor Clarifier B	0.1 lb/hr, 0.1 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-106, Mud Washer A	0.1 lb/hr, 0.2 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-107, Mud Washer B	0.1 lb/hr, 0.2 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-108, Pre-Coats Filter	0.1 lb/hr, 0.1 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-109, Green Liquor Stabilizer Tank	0.1 lb/hr, 0.2 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-75	3.8 lb/hr, 16.6 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-97	2.5 lb/hr, 11.0 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
SN-83	0.9 lb/hr, 3.8 tpy	[Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]

Conclusion: The facility is subject to applicable requirements for Total Reduced Sulfur which typically is what creates many of the odors from pulp and paper facilities.

Air Monitoring

- ADEQ operates a Particulate Matter 2.5 ambient air monitor in Crossett, Arkansas. The 2010-2013 preliminary annual design value is 10 ug/m3 (the NAAQS is 12.0 ug/m3).
- The nearest sulfur dioxide monitor to Crossett is in El Dorado, Arkansas, which is approximately 45 miles away.
- H2S is not a NAAQS so there are not ambient air monitoring requirements.
- The ambient air monitoring regulations require SO2 monitoring based on a combination of population and emissions which Crossett, AR. The new monitoring requirements for the 2010 SO2 standard are not final.
- The PM2.5 monitoring will not accommodate SO2 nor H2S monitoring.
- A climate controlled trailer with specialized H2S or SO2 gaseous monitor would be required to monitor for H2S or SO2, respectively. The estimated costs would be \$25,000 for start up.

2. Community Water Concerns.

Drinking Water

- Ensuring safe drinking water takes a partnership between local, state, and federal entities.
- Under the Safe Drinking Water Act, EPA establishes maximum contaminant levels that are protective of human health, and promulgates drinking water regulations to ensure water provided for human consumption meets such standards.
- State agencies adopt and implement conforming drinking water regulations.
- Local municipal public water systems conduct routine monitoring under state drinking water regulations to ensure drinking water meets federal and state regulatory standards.

Wastewater Treatment

- GP's NPDES permit requires the facility to sample and test its effluent and to monitor its compliance with permit conditions.
- GP is required to file with EPA and ADEQ certified Discharge Monitoring Reports (DMRs) of the results of monitoring.
- EPA has reviewed DMR's over the last 5 years. Only violations were for Dieldrin in November 2013, December 2013, January 2014 and February 2014.
- EPA will continue to monitor the facility.
- Current permit became effective on 11/1/10, was modified on 7/1/11 and expires on 10/31/15.
- The permit is written to implement applicable technology and state water quality requirements.
- Final Outfall 001 is at the discharge point from the final aeration basin (Mill Pond) to Coffee Creek; effluent limits, including WET, apply at this point.
- Stream Monitoring Station SMS 002 is located at the point of discharge from Mossy Lake to Coffee Creek prior to the Ouachita River. SMS 002 floods approximately 6 months out of the year, which prevents it from being monitored year round.

3. Disposal of Hazardous Materials

- The Georgia-Pacific (GP) facility in Crossett is a large quantity generator of hazardous waste.
- Last year 7,099 pounds of hazardous waste was transported from the G-P facility to two approved disposal facilities in Avalon, TX. And Millington, TN.
- GP uses its boiler ash as landfill cover.
- Prior to the boiler ash use and disposal in a solid waste landfill it must show all constituents are analyzed and fall below toxicity characteristic leaching procedure (TCLP) values.
- The ash is has passed analysis conducted by American Interplex labs, which is an accredited lab, in Little Rock, AR.
- Documentation on the analysis of boiler ash and transport of hazardous waste were obtained by EPA during a March 19-21, 2014 inspection.

4. Long-Term Exposure to Hazardous Chemicals

- The Louisiana Environmental Action Network (LEAN) reported air concentrations of hydrogen sulfide from 1 to 25 parts per billion (ppb) downwind from the Georgia-Pacific facility using Jerome Hydrogen Sulfide Monitor.
- The rotten egg smell of hydrogen sulfide would be perceptible at this range (1 to 25 ppb) of air concentrations.
- The range of hydrogen sulfide concentrations (1 to 25 ppb) are below the acute-duration Minimum Risk Level (MRL) (70 ppb) which indicates that harmful effects would not be anticipated from exposure up to 14 days.
- The range of hydrogen sulfide concentrations (1 to 25 ppb) are above the Reference Concentration (RfC) (1.3 ppb) which indicates that long-term exposure (i.e., 70 years) could result in harmful effects.
- Without additional exposure information, the long-term health impacts from hydrogen sulfide cannot be evaluated.
- Hydrogen sulfide has not been shown to cause cancer in humans. The harm caused by hydrogen sulfide is evaluated due to its non-cancer health effects (e.g., irritation to eyes, nose or throat and headaches).

Trip Schedule - Crossett, Arkansas

Name: Israel Anderson, US EPA – R6, OEJTA

Phone: 214-665-2261 or 972-249-5587 (BB)

Date: April 12, 2014

Purpose: Meeting with Community Members

Saturday, April 12, 2014:

8:50 am Depart Dallas-Fort Worth International Airport.

9:55 am Arrive at Monroe Regional Airport (La.).

10:30 am Depart Monroe Regional Airport via Rental Car.

4:30 pm Arrive Crossett, AR.

5:00 pm Concerned Citizens for Environmental Justice (CCEJ) Meeting.

The Living Word Church of God In Christ
2109 Main Street, Crossett, AR 71635
870-364-9487

7:30 pm Depart for Hotel for Overnight Lodging.

Residence Inn by Marriott
4960 Millhaven Rd
Monroe, LA 71203
318-387-0210

Sunday, April 13, 2014:

6:30 am Depart Monroe Regional Airport (La.).

7:55 am Arrive at Dallas-Fort Worth International Airport.

TELEPHONE CONVERSATION RECORD

DATE: January 17, 2014

TIME: 8 a.m.

CALL FROM: Pastor David Bouie, Sr. - Resident - Crossett, AR

SUBJECT: Odors and Dumping

SUMMARY: EPA Region 6 received a voicemail from Pastor David Bouie, Sr. on January 16, 2014, regarding his concerns about strong odors and dumping activities at the Georgia Pacific LLC paper facility in Crossett, AR. I spoke with Pastor Bouie on January 17, 2014, and he stated that the community has been exposed to strong odors and fumes from the facility for the past 2-3 weeks. The odors are still ongoing, and Pastor Bouie said they are strong inside his home as well as outside. Pastor Bouie is also very concerned about trucks from the facility dumping "black liquid" in the area near Westview Cemetery. He is concerned that the facility is illegally dumping and burying hazardous substances in the community. The dumping is also ongoing. He said he has video of the dumping activities and would like to receive a response from ADEQ regarding his concerns. If possible, he would also like a point-of-contact with ADEQ to report concerns with the facility. He can be reached at 870-500-6640.

ACTION TAKEN:

January 17, 2014 - I spoke with Michael McAlister, attorney specialist, (501-682-0918 and mcalister@adeq.state.ar.us) at the Arkansas Department of Environmental Quality (ADEQ) about Pastor Bouie's concerns and also provided him with the information relayed by Pastor Bouie via email.

January 21, 2014 - Pastor Bouie left a voicemail for me regarding a web link from KNOE-TV8 that reported on a "black liquor" spill in Crossett, Arkansas. The substance was the same one that Pastor Bouie was concerned about being dumped and buried in his community. I emailed the news link to Michael McAlister at ADEQ.

January 24, 2014 - I spoke with Heinz Braun, Branch Manager, Air Section, ADEQ (501-682-0756 and braun@adeq.state.ar.us) Mr. Braun informed me that ADEQ staff from their Hazardous Waste, Air, and Water sections were scheduled to be in Crossett on January 27, 2014, to investigate Pastor Bouie's complaint. Mr. Braun said someone from ADEQ would be in touch with Pastor Bouie.

Tressa A. Tillman ~ Office of Environmental Justice and Tribal Affairs (6RA-DA)

U.S. EPA Region 6 ~ Dallas, TX ~ 214-665-2261

ADEQ

ARKANSAS
Department of Environmental Quality

April 17, 2014

Mr. Kenneth Atkins
1018 Atkins Road
Crossett, AR 71635

RE: Georgia-Pacific, LLC Complaint

Dear Mr. Atkins:

The Arkansas Department of Environmental Quality (ADEQ) has investigated three (3) complaints at your property located at 1018 Atkins Road in Crossett, Ashley County, since 2004. A complaint investigated in 2004 alleged the improper disposal of wood waste on your property. Another complaint investigated in 2012 alleged the open burning of waste on your property. Neither of these complaint investigations found any evidence to substantiate the nature of the complaints. The most recent was your complaint against Georgia-Pacific, LLC which was investigated on August 28, 2013. Based on the information gathered during our August 2013 investigation, ADEQ did not find any evidence to indicate chemical waste had been buried on your property. Attached for your records is a copy of this complaint investigation report.

Please provide any additional information regarding the alleged burial of waste on your property. Until ADEQ receives specific information regarding the exact location of any potential waste buried on your property, we consider this case closed. If you have any additional questions or concerns, please do not hesitate to contact Penny J. Wilson of my staff at 501-682-0868.

Sincerely,



J. Ryan Benefield
Deputy Director

cc: Samuel Coleman (6RA), U.S. EPA Region 6
1445 Ross Ave., Suite 1200, Dallas, Texas 75202-2733

ADEQ

ARKANSAS
Department of Environmental Quality

September 23, 2013

MEMORANDUM

TO: Georgia Pacific File -- AFIN 02-00013

THRU: Tammie Hynum, Chief, HWD, ADEQ
Tamara Almand, Enforcement & Inspection Branch Manager, HWD, ADEQ
Penny Wilson, Inspector Supervisor, HWD, ADEQ

FROM: Judy K. Russell, Inspector, HWD, ADEQ

DATE: September 11, 2013

Subject: Hazardous Waste Complaint #015924 -- Georgia Pacific Corporation, Crossett,
Arkansas

On August 28, 2013, I investigated the above complaint. I was accompanied by Brett Baker, Hazardous Waste Division Inspector Supervisor and Matt Brooks, Deputy, of the Ashley County Sheriff's Department. Upon arrival, I asked Mr. Atkins to give me some background regarding the complaint. Mr. Atkins stated that at some point in the past (maybe 6 years) a representative of Georgia Pacific, Mr. Larry Robinson, had arranged with him to dispose of construction materials from Georgia Pacific in an excavation on Mr. Atkins' property. When he was told by an inspector from ADEQ Solid Waste Division that he couldn't use the excavation as a landfill, he no longer accepted these materials from Georgia Pacific, or neighbors. Sometime later, according to Mr. Atkins, A dump truck load of 55-gallon containers were dumped into the excavation with the construction materials. Mr. Atkins stated that on his way home that day, he saw a 55-gallon container on the road to his property, and stopped to pick it up. It contained, Mr. Atkins said, what appeared to be an acid. When he arrived home, he saw approximately 50-60 55-gallon containers in the excavation which appeared to be the same as the container he'd picked up. He contacted Mr. Robinson of Georgia Pacific, who claimed to know nothing of the containers. Mr. Atkins covered the dump site and nothing more was addressed until this complaint.



I saw no indications, by way of distressed vegetation, lack of vegetation, or stained soil, which might indicate that there had been chemicals buried on this property (See Photos 1-8 attached to this memo). I advised Mr. Atkins that he would need some form of documentation (photos, records of truck load contents, etc.) that would connect Georgia Pacific to his complaint before ADEQ could pursue the complaint further.

On September 10, 2013, Mr. Atkins called me to say that he had several notarized statements from truck drivers who had previously accepted waste from Georgia Pacific to be dumped into the open excavation site on Mr. Atkins' property. In addition, during the course of the conversation, he alleged that Georgia Pacific had contracted these same truck drivers to dispose of potash, as well as containers of acid, and construction materials.



Attachment:

Photos



**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:	Property of Mr. Kenneth Atkins, 108 Atkins Road, Crossett, Arkansas						
Photographer:	Judy K. Russell				Witness:	N/A	
Photo #	1	Of	8		Date:	8/28/2013	Time: 10:40
Description:	The road leading into Mr. Atkins' property.						
							
Photographer:	Judy K. Russell				Witness:	N/A	
Photo #	2	Of	8		Date:	8/28/2013	Time: 10:45
Description:	Facing the back of the property's left side where the containers are allegedly buried.						
							



**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:	Property of Mr. Kenneth Atkins, 108 Atkins Road, Crossett, Arkansas						
Photographer:	Judy K. Russell				Witness:	N/A	
Photo #	3	Of	9		Date:	8/28/2013	Time: 10:48
Description:	The view immediately to the right of the previous photo.						
							
Photographer:	Judy K. Russell				Witness:	N/A	
Photo #	4	Of	8		Date:	8/28/2013	Time: 10:50
Description:	The back of the property of the property and part of a depression in the soil where the drums are allegedly buried.						
							

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:	Property of Mr. Kenneth Atkins, 108 Atkins Road, Crossett, Arkansas						
Photographer:	Judy K. Russell				Witness:		
Photo #	5	Of	8		Date:	8/28/2013	Time: 10:50
Description:	A drainage pathway to the left of the alleged burial site.						
							
Photographer:	Judy K. Russell				Witness:	N/A	
Photo #	6	Of	8		Date:	8/28/2013	Time: 10:52
Description:	A depression on the property on top of the alleged burial site.						
							

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:	Property of Mr. Kenneth Atkins, 108 Atkins Road, Crossett, Arkansas						
Photographer:	Judy K. Russell				Witness:	N/A	
Photo #	7	Of	8		Date:	8/28/13	Time: 10:55
Description:	The back side of Mr. Atkins' property.						
							
Photographer:	Judy K. Russell				Witness:	N/A	
Photo #	8	Of	8		Date:	8/28/13	Time: 11:01
Description:	The view of Mr. Atkins' property looking from the back to the front.						
							

Tillman, Tressa

From: Coleman, Sam
Sent: Thursday, April 17, 2014 2:28 PM
To: Tillman, Tressa; Anderson, Israel; Gilrein, Stephen
Subject: FW: 2014 04 17 Georgia Pacific, LLC - Complaint on property 1018 Atkins Road in Crossett
Attachments: 2014 04 17 Georgia Pacific, LLC - Complaint on property 1018 Atkins Road in Crossett.pdf

From: Johnson, Kelli [<mailto:johnsonk@adeq.state.ar.us>]
Sent: Thursday, April 17, 2014 2:20 PM
To: hynum@adeq.state.ar.us
Cc: benefield@adeq.state.ar.us; Wilson, Penny; Coleman, Sam
Subject: 2014 04 17 Georgia Pacific, LLC - Complaint on property 1018 Atkins Road in Crossett

Attached: Georgia Pacific, LLC - Complaint on property 1018 Atkins Road in Crossett

Kelli F. Johnson
Administrative Assistant III
Hazardous Waste Division
johnsonk@adeq.state.ar.us
(p) 501-682-0833
(f) 501-682-0565



Arkansas Department of Environmental Quality
Solid Waste Management Division
Complaint/Illegal Dump Investigation Worksheet



County	Ashley	PDS ID	016545	AFIN	02-00000	Page 1 of 2
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Date Received	1/17/2014	Received By	M. Womble
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Complainant Name / Address / Phone	Anonymous
Rev. David Bouie	
Michael McAlister Legal Division-ADEQ	

Complaint Lodged Against / Address / Phone
Georgia Pacific Paper Facility Crossett, AR

Location Description	Complaint Description of Waste
Georgia Pacific Paper Facility in Crossett, AR	Order, fumes and dumping of "black liquid".

Investigation Section

Date Investigated	1-27-2014	Time Investigated	14:40
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SECTION 1		Size of Waste Mass	Violation Ranking	Points
Length		>640 yd ³	5	
Width		320 yd ³ to 640 yd ³ = 16 roll offs	5	
Height		160 yd ³ to 320 yd ³ = 8 roll offs	4	
Total		80 yd ³ to 160 yd ³ = 4 roll offs	3	
~yd3		40 yd ³ to 80 yd ³ = 2 roll offs	2	
		40 yd ³ or < = 1 roll off	1	
Size of Waste Mass Score			0	

SECTION 2		Contents of Waste Mass	Violation Ranking	Points
Household Waste			5	
Hazardous Items {i.e. paint thinner, cleaning chemicals, oil cans, herbicides, medical waste, asbestos}			5	
White Waste {i.e. Refrigerators and appliances that may contain Freon}			3	
Construction/Demolition Waste			3	
Approximate Number of Tires:			3	
Abandoned Vehicles /Auto Parts: {May contain gasoline, oil, antifreeze or other automotive fluids}			2	
Other Bulky Waste: {i.e. TV's, Furniture, Mattresses, etc.}			2	
Yard Waste			1	
Dead Animals			4	
Other				
Contents of Waste Mass Score			0	

Darryl Eddy

ADEQ Complaint/Illegal Dump Investigation Worksheet		PDS ID 016545	Page 2 of 2
SECTION 3		Site Assessment	Violation Ranking Points
Air Pollution	Open Burning	5	
Air Pollution	Evidence of Open Burning	4	
Air Pollution	Strong; Foul Odor Present	3	
Water Pollution	Waste in or near standing or flowing water	5	
Water Pollution	Probability of leachate (run-off) into ground/surface water	5	
Public Health Risk Assessment	Vectors sighted	5	
Public Health Risk Assessment	Evidence of Vectors (i.e. rats, flies, mosquitoes, snakes, scavengers)	4	
Site Usage Assessment	Site attended or maintained for a fee	5	
Site Usage Assessment	History of previous complaints	5	
Site Usage Assessment	Active, attractive nuisance; evidence of recent dumping	5	
Site Usage Assessment	Dumping resumed at cleaned up or closed site	4	
Site Usage Assessment	Old Site; no evidence of recent dumping; overgrown	2	
		Site Assessment Score	0
*Violation Ranking: 1 (Least Serious Violation) to 5 (Most Serious Violation)		TOTAL SCORE	0
GPS Reading N 33.12578 W 91.98258			
SECTION 4		Violations	
Solid Waste Management Act §8-6-205			
	(a)(2) To construct, install, alter, modify, use or operate any solid waste processing or disposal facility or disposal site without a permit from the department		
	(a)(3) To dispose of solid wastes at any disposal site or facility other than a disposal site or for which a permit has been issued by the department		
	(a)(3) Individual's household disposal that creates a public or private nuisance or a hazard to health and/or violates a city ordinance or other law and/or involves the open dumping of garbage		
	(a)(4) To dump, deposit, throw, or in any manner leave or abandon any solid wastes upon property owned by another person without the written permission of the owner or upon public property		
	(a)(5) To sort, collect, transport, process, or dispose of solid waste contrary to the rules, regulations or orders of the department, or create or likely to create a public nuisance or public health hazard or to cause or likely to cause water or air pollution (Ark. Water and Air Pollution Control Act §8-4-101 et seq)		
	(b) A rebuttal presumption when one (1) or more items of solid waste bear the name to indicate that the person committed the unlawful act of disposal		
Air Pollution Control Code §8-4-310(a)(1)(2)(3)			
	5)(a) No person shall cause or permit the open burning of refuse, garbage, trade wastes or other waste material, or shall conduct a salvage operation by open burning		
Investigation Comments			
This investigation concerns the allegation of trucks from the Georgia Pacific Paper LLC dumping "black Liquids" in the area near Westview Cemetery. 1/27/2014 at 14:40 I arrived at the Westview Cemetery and examined the cemetery and surrounding area including the roads and property adjacent to the cemetery (see photos 1&2). I saw no evidence or indication where black liquids had been dumped. I called David Bowie and left a voice mail for him to contact me.			
Final Disposition			
X	INVALID COMPLAINT		VALID COMPLAINT
X	No evidence found		Letter Sent
	No illegal disposal occurring		Follow-up Investigation
	Salvageable materials		Response Received
	8-6-205(a)(3) exemption		No further action
	Unknown violator – No further action		Complaint Forwarded To



Arkansas Department of Environmental Quality
Solid Waste Management Division
Complaint/Illegal Dump Investigation Worksheet Attachment



County	Ashley	PDS ID	016545	Date	1/31/2014	Follow-up Investigation		Page 3
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Location *Georgia Pacific Paper Facility in Crossett, AR*

Investigation Comments

1/30/2014 at 10:10 - I met with James Cutbirth (Environmental Manager GP Paper) Mr. Cutbirth was aware of the complaint and explained a recent increase in truck traffic on Westview Cemetery road had occurred as ash from GP's ash reclamation area near the cemetery was transported to GP's Chemical operation and used for solidification material during a surface water containment closure. I accompanied Mr. Cutbirth to the Chemical Plant and Met with Molly Mathews (GP Chemical Plant Manager), we proceeded to the closed out surface water containment location and viewed the area (see photo #3). Mr. Cutbirth then drove me to the Westview cemetery and GP's property gate leading to the Mill's wastewater treatment facility and ash reclamation area. We observed the surrounding area and I saw no evidence of dumping.

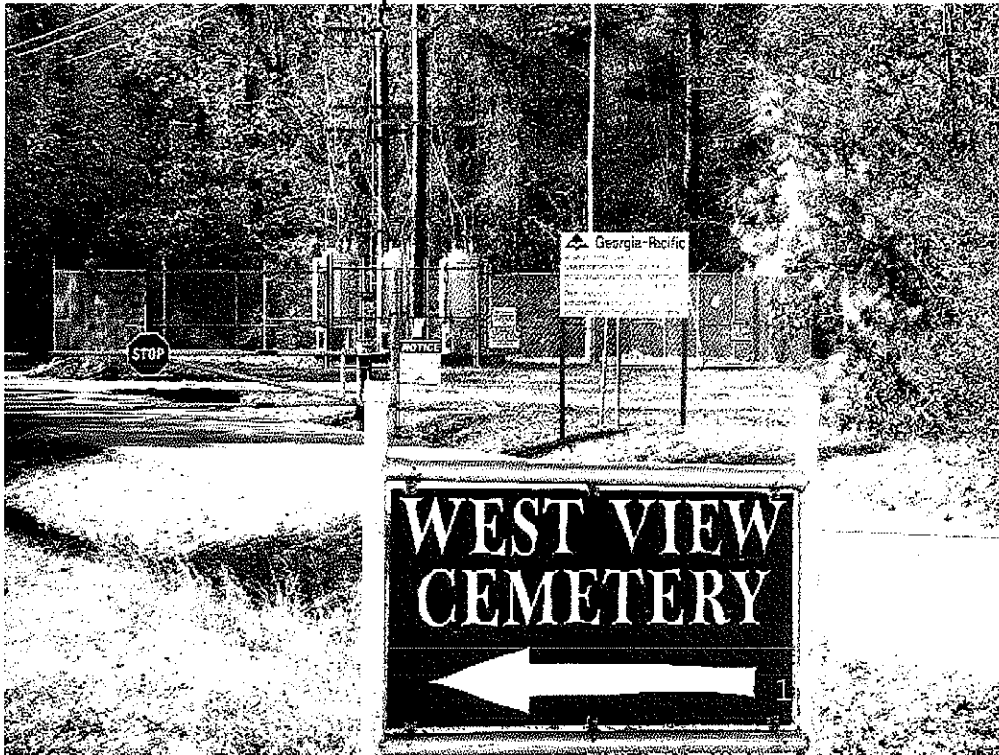
1/31/2014, 09:45- Mr. David Bouie returned my call and I explained my findings.

Final Disposition

No evidence of dumping found

Larry Eddy

Complaint 016545 Photos 1&2



Complaint 016545 Photo 3

